

1 MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
2 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
3 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
4 MORRISON & FOERSTER LLP  
425 Market Street  
5 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
6 Facsimile: 415.268.7522  
  
7 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.,  
8 OTTOMOTTO LLC, and OTTO TRUCKING LLC

9 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsflp.com  
10 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsflp.com  
11 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
12 Washington DC 20005  
Telephone: 202.237.2727  
13 Facsimile: 202.237.6131

14 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
15 and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,  
20 Plaintiff,  
21 v.  
22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF CAMILA  
TAPERNOUX IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBITS TO THEIR DISCOVERY  
LETTER BRIEF REGARDING APEX  
DEPOSITIONS**

Trial Date: October 10, 2017

1 I, Camila Tapernoux, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based upon matters  
4 within my own personal knowledge and if called as a witness, I could and would competently  
5 testify to the matters set forth herein. I make this declaration in support of Defendants'  
6 Administrative Motion to File Under Seal Exhibits to Its Discovery Letter Brief Regarding Apex  
7 Depositions.

8 2. I have reviewed the following documents and confirmed that the material  
9 identified below merits sealing:

Document	Portions to Be Filed Under Seal
Exhibit A	Entire Document
Exhibit B	Entire Document

14 3. Both of these exhibits were designated "Highly Confidential – Attorneys' Eyes  
15 Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order  
16 ("Protective Order"), which the parties have agreed govern this case (Transcript of 3/16/2017  
17 Hearing, page 6). Defendants do not agree that this material merits sealing, but are required to  
18 file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

19 4. Defendants' request to seal is narrowly tailored to those portions of its letter brief  
20 and exhibits that it is required to file under seal.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is  
22 true and correct. Executed this 6th day of July, 2017, in San Francisco, California.

23  
24 /s/ Camila Tapernoux  
25 Camila Tapernoux  
26  
27  
28

**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Camila Tapernoux has concurred in this filing.

Dated: July 6, 2017

/s/ Arturo J. González  
Arturo J. González